

US EPA RECORDS CENTER REGION 5



503862

February 25, 1981

Mr. Michael L. Munsell
Industrial Health Coordinator
Ren Plastics
5656 South Cedar Street
P.O. Box 23037
Lansing, Michigan 48909

Re: Dawn Avenue Plant

Dear Mr. Munsell:

We are in receipt of your February 10, 1981 letter outlining addendum III and ~~IV~~ to your existing Pollution Incident Prevention Plan (PIPP). Although addendum III is viewed as a temporary measure, we cannot approve it for inclusion in your plan. An acceptable PIPP must contain permanent spill controls or, in their absence, a realistic time schedule for complying with our containment requirements prior to use of a storage area.

As pointed out in our February 23, 1981 meeting with you, your temporary measures for preventing losses from your barrel storage area can result in an accumulation of contaminated runoff that would present a monstrous problem for disposal. The area drained by the barrel storage pad and the surrounding paved area represents about 22,000 square feet. For every 0.1 inch of rainfall, you would generate about 1,400 gallons of runoff. This represents about 25 drums of contaminated water you would have to collect and remove for disposal. Since you propose to dispose of this water by incineration, this could be a very costly venture. It would seem that a temporary 4-inch curbing of asphalt could be placed very quickly at a minimal expense. At least this would retain losses within the drum storage area making clean up easier. It appears that the only alternative you have to such a temporary diking is to physically remove these drums from the storage pad to a secure area. It is noted that during our recent visit, we did not observe any leaking drums or spilled materials within the drum storage area. The drums we observed appeared to be in sound, physical condition. However, the point remains that you must either put up a temporary dike or physically remove these drums to a secure site. Either alternative must be accomplished no later than March 20, 1981.

Mr. Michael L. Munsell

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February 25, 1981

Please inform us by letter no later than March 5, 1981 of your commitment to either of these alternatives.

In regards to addendum IV of your February 10, 1981 letter, we have the following comments:

1. Your initial testing of the underdrainage water, that was to begin February 23, 1981, should include a gas chromatograph scan to provide additional background water quality data. The results of this initial sampling must be presented to us by March 20, 1981.
2. Please give us a written schedule for the initial pressure testing and future testing of all underground storage tanks; not just those seven with the tile underdrain.

I have a few general comments concerning our February 23, 1981 meeting. The 8,000 gallon storage tank is currently empty. This tank and its associated underground piping and valves must be pressure tested and defects corrected prior to placing it back in service.

I left a copy of our October 1, 1980 critical materials register with you. Please review this carefully and any amounts of these critical materials used or stored at your plant must be noted and included in your PIPP. This notation must include a key, locating each storage site on your property. This update of your list of critical materials was requested by us during our January 26, 1981 meeting but was not included in your February 10, 1981 letter. Please submit this update by March 20, 1981.

Please contact myself or John Kraft if you have any questions regarding your Pollution Incident Prevention Plan.

Very truly yours,

WATER QUALITY DIVISION



Thomas A. Newell
Acting District Engineer

TAN/jg
cc: J. Bohunsky

STATUS REPORT ON
REN PLASTICS CO.
Pollution Incident Prevention Plan (PIPP)

In a letter dated February 10, 1981 the Company responded to our request for a modified, improved pollution control plan. This plan has been evaluated by our district staff and determined to be unsatisfactory and no approvable at this time.

Presently the Company utilizes an approximate 4,000 sq. ft. concrete pad to store drums of solvents and waste materials. Reportedly, none of the materials on the pad are listed on the critical materials list. Some of the drum material is classified as waste in accordance with RCRA requirements and is stored on the pad for eventual disposal. As a temporary measure, Ren Plastics proposes to seal off the storm drain and eliminate runoff from the general vicinity of the pad. Drainage from the site according to their plan would be tested for contamination and collected if found to be contaminated. This proposal is not satisfactory and the Company will be required to curb the storage area as a measure to provide a more positive control of spillage from the site. A meeting will be held with the Company within the next few days to discuss our objections to the Company's proposal to handle spillage on the pad.

The Company's proposal to detect leakage from eleven underground tanks is sound and will probably be approved with minor modifications. The buried tanks are encircled with a 4" tile which would intercept any leakage to the ground. Flow in the tile would be tested 3 times weekly and analyzed for contaminants. In addition, the buried tanks will be pressure tested on a routine basis.

John M. Bohunsky
February 23, 1981

JMB:amk

Xc: newey [signature]

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